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**REMARKS/ARGUMENTS**

Claims 1-15 are pending in this application, and claims 1, 6, and 11 are currently amended. Such amendments are fully supported by the specification. For at least the reasons stated below, Applicant asserts that all claims are in condition for allowance.

**A. THE REFERENCES DO NOT TEACH OR SUGGEST THE INVENTION AS CLAIMED.**

Claims 1-15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Miller* (U.S. Patent No. 6,202,052) in view of *Hunkins et al.* (hereinafter *Hunkins*, U.S. Patent No. 5,970,501). Applicant respectfully opposes these rejections.

The present invention generally provides for a network-based tax service database interface, including:

- (a) accessing tax-related forms in a governmentally maintained forms database, wherein the tax-related forms include a plurality of fields;
- (b) accessing a revenue services database, wherein the revenue services database stores tax return data in duplicate, in a first table on the revenue services database and in a second table on the revenue services database;
- (c) extracting a portion of the tax return data from the revenue services database, such that the extracted tax return data is provided to a legacy processing system from the first table and the extracted tax return data is provided to a corporate information database from the second table;
- (d) completing at least one of the tax-related forms, wherein a first set of fields from the plurality of fields are filled based on the tax return data, wherein the tax return data on which field filling is based is extracted from both the legacy processing system and a succeeding processing system, wherein a second set of fields from the plurality of fields is populated based on data entered into a first set of fields, and wherein the revenue services database mirrors data tables on the succeeding processing system;
- (e) submitting the tax-related forms to a governmental entity, wherein the tax-related forms are formatted based on rules associated with the governmental entity;
- (f) sending updates to the tax-related forms to a processor utilizing a network for processing and subsequent use; and
- (g) displaying an activities interface to the user, wherein the activities interface identifies activities for users to complete, and governs the data collection process for completing the identified activities.

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The cited references fail to teach or suggest every limitation of the independent claims. Specifically, the cited references do not teach or suggest at least: (1) storing tax return data on a database in duplicate; (2) storing updates of tax-related forms for future use of the data therein; and (3) displaying an activities interface to the user including potential activities of interest to users and governing data collection to complete such activities.

**(1) Storing Tax Return Data on a Database in Duplicate**

The present claimed invention recites, *inter alia*, a revenue services database that stores tax return data in duplicate on two tables to alleviate the load on any one table containing needed tax data by allocating each of the two tables for separate and distinct uses. The Examiner asserts:

It would have been obvious to one of ordinary skill in the art at the time of the invention to combine the teachings of Miller and Hunkins because Hunkins contemplates storing data in duplicate both within a single database, and between multiple databases in an organization. The benefit would have been to maintain multiple copies of critical information.

The claimed invention does more than just "maintain multiple copies of critical information" because it also specifically allocates distinct uses and interconnections for each of the two tables. The revenue services database (ROS) stores tax return data in duplicate on a first and a second table. These two tables serve different purposes: tax return data extracted from the first table goes to a legacy processing system - a core processing system or "existing systems" - and tax return data extracted from the second table goes to a corporate information database - a corporate information facility (CIF). *See*, Specification, pp. 15-16, 123-24; Figs. 4, 30 (describing the storage of returns data in duplicate on the ROS database in two tables, one for extract to CIF and one for extract to core processing systems). This feature of the present claimed invention enables data extraction for the corporate information database and the legacy processing system to be performed independently of one another.

Element (c) of the independent claims recite "extracting a portion of the tax return data from the revenue services database, such that the extracted tax return data is provided to a legacy processing system from the first table and the extracted tax return data is provided to a corporate information database from the second table." Neither of the cited references teach or suggest these limitations.

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*Miller* is directed towards an electronic intermediary collecting tax data from a variety of tax data providers via electronic links. *See Miller* specification; Fig. 2; Col. 5, lines 50-65. *Miller* fails to teach or suggest duplicate storage of tax return data on a single database let alone two tables on the single database, extracted data from which is provided to a legacy processing system and a corporate information database.

*Hunkins* describes automated synchronization of data within a database structure to optimize data integrity of duplicate data in various databases. *See Hunkins* specification; Col. 4, lines 8-13. Nowhere does this reference mention extracting different portions of the data for varying databases within a network-based database interface for independent use in completely different applications.

For at least these reasons, the cited references fail to teach or suggest every claimed element of the independent claims 1, 6 and 11 and therefore also the remaining dependent claims. Applicants respectfully request that Examiner's § 103 rejections be withdrawn.

**(2) Storing Updates of Tax-related Forms for Future Use of the Data Therein**

The present claimed invention further recites (in element (d) of the independent claims) completing tax-related forms based on automatically filling in fields with data "extracted from both the legacy processing system and a succeeding processing system, wherein a second set of fields from the plurality of fields is populated based on data entered into a first set of fields, and wherein the revenue services database mirrors data tables on the succeeding processing system".

In response, the Examiner asserts:

It would have been obvious to one of ordinary skill in the art at the time of the invention to combine the teachings of *Miller* and *Hunkins* because both deal with organizations that access multiple databases likely containing some duplicate data.

The claimed invention does more than just "access multiple databases likely containing some duplicate data." The revenue services database follows the same database design approach as the succeeding processing system - an integrated taxation processing system (ITP) - which positions the revenue services database for the future when major taxes are included in the succeeding processing system. *See*, pp. 137-38; Figs. 30-32. This alignment of the revenue services database with the succeeding processing system, *inter alia*, facilitates the introduction of

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new taxes and forms onto the revenue services database and minimizes the maintenance costs associated with the revenue services database because code developed for the succeeding processing system can be reused as the next generation succeeding processing system becomes increasingly integrated into the network-based tax services. *Id.* Calculations of certain fields in the tax-related forms are conducted on the client side of the revenue services database. *See*, pg. 111. While certain fields in the forms are filled in based on data in the database, once these fields are filled in, then other fields are calculated based on this information. Thus, this alignment requires more than simply accessing multiple databases potentially containing some duplicate data.

The claims recite:

completing the tax-related forms, wherein at least a portion of the plurality of fields are filled based on the tax return data, such that the tax return data on which field filling is based is extracted from both the legacy processing system and a succeeding processing system, wherein a second field is populated by data entered into a first field, and wherein the revenue services database mirrors data tables on the succeeding processing system.

Neither *Miller* nor *Hunkins* teach or suggest these limitations.

*Miller* is directed towards an electronic intermediary that merely processes the tax data collected from various tax data providers and reports it in a format corresponding to the relevant forms of the taxing authority. *See Miller* specification; Fig. 2; Col. 6, lines 42-61. Nowhere does this reference teach or suggest completing tax-related forms based on automatically filling fields with tax return data extracted from both a legacy processing system and a succeeding processing system such that calculated fields are automatically populated based on both sources of data.

*Hunkins* describes synchronous updating of redundant data in four external databases via a single change order entered in a common database. *See Hunkins* specification; Fig. 3; Fig. 4; Col. 5, lines 5-20). In this manner, *Hunkins* is directed toward maintaining data across both internal and external databases. This is clearly different than Applicant's invention as claimed wherein tax-related forms are completed based on data obtained from both legacy systems and succeeding processing systems with embedded logic allowing certain fields to be calculated based on data from both systems.

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For at least these reasons, the cited references fail to teach or suggest every claimed element of the independent claims 1, 6 and 11 and therefore also the remaining dependent claims. Applicants respectfully request that Examiner's § 103 rejections be withdrawn.

**(3) Displaying a User Inbox Including Potential Activities of Interest to Users and Governing Data Collection to Complete Such Activities**

*Miller and Hunkins* do not teach or suggest displaying an activities interface.

Specifically, the prior art does not teach or suggest "displaying an activities interface to the user, wherein the activities interface identifies activities for users to complete, and governs the data collection process for completing the identified activities."

Because the cited references fail to teach or suggest all of the claim limitations of claims 1-15, Applicant respectfully requests that the Examiner's § 103 rejections be withdrawn.

**B. CONCLUSION**

Applicant submits that all pending claims are allowable and respectfully requests that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (612) 607-7386.

If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees including fees for any extension of time, to Deposit Account No. 50-1901 (Reference 60021-357801).

Respectfully submitted,

Date: January 5, 2005

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